

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DR. ELVISHA DHAMALA, DR. SHELLIE
FACENTE, DR. ROBERT MAHON, and
DR. LUCINA UDDIN,

Plaintiffs,

v.

ELSEVIER, B.V., INFORMA PLC,
INTERNATIONAL ASSOCIATION OF
SCIENTIFIC, TECHNICAL, AND
MEDICAL PUBLISHERS, JOHN WILEY &
SONS, INC., SAGE PUBLICATIONS, INC.,
SPRINGER NATURE AG & CO. KGaA.,
TAYLOR & FRANCIS GROUP, LLC,
TAYLOR & FRANCIS GROUP, LTD.,
WOLTERS KLUWER HEALTH, INC.
WOLTERS KLUWER N.V., and JOHN
DOES 1 THROUGH 50,

Defendants.

Case No. 1:24-cv-06409-HG

**DECLARATION OF WOLTERS
KLUWER, N.V.**

I, Maarten C. Thompson, hereby declare:

1. I am Senior Vice President, General Counsel/Company Secretary at Wolters Kluwer N.V..
2. I have personal knowledge of the matters set forth in this declaration, and believe them to be true and correct based on (a) my work for Wolters Kluwer N.V., and (b) the review, at my direction, of relevant business records of Wolters Kluwer N.V.
3. Except where otherwise indicated, all statements apply to the time period covered by plaintiffs' allegations in the amended class action complaint filed in this matter on November 15, 2024, namely the period between September 12, 2020 to present.
4. Wolters Kluwer N.V. is a Dutch corporation, headquartered at Zuidpoolsingel 2, Alphen aan den Rijn, the Netherlands. It is a publicly listed organization under Dutch law. Wolters Kluwer N.V.'s corporate governance structure and operations are governed by Wolters Kluwer N.V.'s Articles of Association and By-Laws, among other instruments, as well as applicable Dutch law. It maintains all corporate formalities as required under the Dutch

Civil Code, Dutch Corporate Governance Code (2022), and all applicable laws and regulations.

5. Wolters Kluwer N.V. is primarily a holding company with minimal operations. It is the ultimate parent company of the Wolters Kluwer family of companies (the “Wolters Kluwer Group”), which operates in five global operating divisions: Health, Tax & Accounting, Corporate Performance & ESG, Financial Corporate Compliance (“FCC”), and Legal & Regulatory.
6. Wolters Kluwer N.V. has no employees in the United States. Wolters Kluwer N.V. does not have operations in the United States but does have United States-based subsidiaries with their own employees. Wolters Kluwer N.V. does not earn any commercial revenue or conduct commercial activity worldwide.
7. Wolters Kluwer N.V. is not incorporated in New York or in any other state in the United States.
8. Wolters Kluwer N.V. is not registered to do business in New York or in any other state in the United States.
9. Wolters Kluwer N.V. has no physical office or other regular place of business in New York or in any other state in the United States.
10. Wolters Kluwer N.V.’s management and day-to-day operations are entrusted to Wolters Kluwer N.V.’s Executive Board. The Executive Board consists of Wolters Kluwer N.V.’s Chief Executive Officer (“CEO”) and Chief Financial Officer (“CFO”). Wolters Kluwer N.V.’s CEO and CFO are appointed by Wolters Kluwer N.V.’s shareholders at Wolters Kluwer N.V.’s General Meeting of Shareholders. Currently, Wolters Kluwer N.V.’s CEO is Nancy McKinstry and its CFO is Kevin Entricken. Wolters Kluwer Health, Inc. has an independent management committee that is separate from the Wolters Kluwer N.V. Executive Board.
11. Tax residency of Wolters Kluwer N.V. is in the Netherlands.
12. While certain subsidiaries of Wolters Kluwer N.V. own journals and conduct other business, Wolters Kluwer N.V. does not own any scholarly journals or publish articles in any such journal.
13. Wolters Kluwer N.V. does not contract with authors or peer-reviewers for their services.
14. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Alphen aan den Rijn,
May 2, 2025,



M.C. Thompson
Senior Vice President, General Counsel/Company Secretary